AMERICAN INSTITUTE OF MERCHANT SHIPPING

Industry Advocate for 25 Years

Est. 1968

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

IN THE MATTER OF	:	
Inspection of Radio Installations	:	**CI Docket No. 95-55**
on Large Cargo or Small Passenger	:	**FCC 95-171**
Ships	:	

To: The Commission:

COMMENTS OF
THE
AMERICAN INSTITUTE OF MERCHANT SHIPPING (AIMS)

The American Institute of Merchant Shipping (AIMS) is a national trade association representing 23 U.S.-flag carriers which own or operate approximately eleven million deadweight tons of tankers, dry bulk carriers, containerships, and other oceangoing vessels engaged in the domestic and international trades of the United States. AIMS represents a majority of U.S.-flag tanker and liner tonnage. We appreciate the opportunity to provide comments to this docket.

Before commenting on specific suggestions for change, we believe it helpful to point out certain aspects of the existing inspection/testing regime. The NOI correctly states the partnership between the FCC and shipowners with respect to safety communications. It is interesting to note the statement in paragraph three of the NOI which places a responsibility on the inspector to ensure the radio equipment provides safety

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communications capability "at the time of inspection" and the ship operator is responsible "at all other times." The ship operator, therefore, has a constant responsibility. This is attested to by requirements the ship must meet which include: daily requirement to test radiotelephone (80.869); daily test of the bridge-to-bridge radiotelephone (80.1023); weekly tests of survival craft radio equipment (80.832); daily test of the radiotelephone alarm (80.817); and, daily tests outside port of the reserve telegraphy installation and automatic alarm signal keying device (80.811). The GMDSS is included in that it must be tested before leaving port if shore-based maintenance is used (80.1105). Making changes in the federal government's responsibility affects a small portion of the testing responsibility as the overwhelming majority rightfully resides with the ship operator.

We agree with the NOI where it states that federal inspection is important in that it verifies the proper installation of equipment and that it functions as intended. Of these two purposes, the ship operator performs the second on a daily basis by using the communications equipment for business or testing it as noted above, or both. Given the singular aspect of the purpose of the government inspection, we see no compelling reason why the inspection must be performed by a government employed inspector. We recognize, however, the government should be satisfied as to the quality of the inspector and should exercise oversight control with respect to inspectors working on behalf of the government.

At present, there are two general types of sea-going vessels which must be inspected: those with telegraphy; and, those utilizing modern equipment including those fully outfitted with GMDSS.

We suggest that no changes be made to the inspection process for telegraphy equipped ships. The last of these will phase out in 1998 and it seems to us to be a waste of effort to make plans for such a limited period.

For those ships equipped with modern equipment including those with a full suite of GMDSS equipment, we believe major changes can be made in the inspection process. As the NOI states, much of the equipment incorporates self-test features. Another consideration is the type-approved testing which ensures compliance of the equipment with the technical standards such as frequency tolerance, modulation and output power. However, much of the inspection is merely to verify the existence of the equipment. Its proper operation can be ascertained through a single use of the equipment.

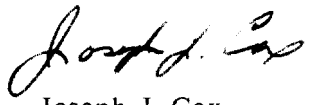
We strongly suggest the FCC consider accepting reports from non-government inspectors. These include classification societies, technical representatives of marine electronic companies, or other persons whose background is satisfactory to the FCC.

We also suggest that the interval between inspections be reviewed. When the radio equipment (telegraphy) was subject to internal changes, a yearly inspection could be justified. With modern equipment, the rationale does not exist. An initial inspection can be performed and yearly certifications made by the shipowner. The yearly certification could attest that the equipment is operating as required and that any replacements made are with type-approved equipment.

We further suggest the FCC should retain a presence in the verification process. This can be accomplished off-site by contacting ships via one, or several, of the pieces of equipment on board. The fact that communication is made meets the purposes of the inspection.

We appreciate this opportunity to provide input to the Notice of Inquiry. Communication with ships is now largely automated and it seems sensible to utilize that automation in the inspection process.

Sincerely,



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